

**W. G. Hairston III**  
President and  
Chief Executive Officer

**Southern Nuclear  
Operating Company, Inc.**  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201

Tel 205.992.5581  
Fax 205.992.6165

550859

RECEIVED

SEP 24 2001



September 18, 2001

Ms. Carol Hanlon  
U.S. Department of Energy  
Yucca Mountain Site Characterization Office (M/S #025)  
P.O. Box 30307, North Las Vegas, Nevada  
89036-0307

**SUBJECT:** Southern Company's comments on the Preliminary Site Recommendation  
for Yucca Mountain

Dear Ms. Hanlon:

Southern Nuclear Operating Company, which operates three nuclear power plants for Georgia Power Company and Alabama Power Company, strongly supports recommending Yucca Mountain as a repository for spent nuclear fuel. More than 20 years and more than \$7 billion have been spent in detailed scientific and engineering studies to ensure that a repository at Yucca Mountain can protect public and worker health and safety. International scientific consensus concludes that geological disposal is our best option for long-term storage, it is time to move forward with Yucca Mountain.

Southern Nuclear's three nuclear power plants, Plant Farley, Plant Hatch and Plant Vogtle, have supplied safe, reliable, economic and environmentally friendly power for many years. They play a key role in Southern Company's efforts to reduce greenhouse gas emissions and supply 20% of the electricity generated by Southern Company. Together, the three plants account for about a half of the total reduction of carbon dioxide reported each year for Southern Company.

The federal government established the legal and regulatory framework for the commercial operation of nuclear power plants and has the long-standing responsibility and obligation to manage spent nuclear fuel. That obligation has been reaffirmed by court decisions and, as you know, we – and by definition, our customers – have paid over \$670 million dollars into the Nuclear Waste Fund for this federal disposal program. With no repository in sight, we have had to spend additional millions to store fuel on site. Plant Hatch, which began operation in 1975, has spent-fuel pools designed for 20 years of storage. In order to continue to operate the plant, which produces 1,800 megawatts of emission-free electricity, we have already spent in excess of \$20 million on a temporary dry storage system. At Plant Farley, which began generating electricity in 1977, we will have to build a similar dry storage facility.

America's nuclear plants have an enviable record of safety, and there have been many years in which Southern Nuclear's sites were among the safest places to work in the nation. No one is more concerned than we are that used nuclear fuel is disposed of safely. Decades of extensive research have shown that Yucca Mountain is our best and safest choice for long-term storage. The Department of Energy's recently released Preliminary Site Suitability Evaluation is based on extensive scientific and engineering research that meets both the technical and legal requirements for moving forward towards making a federal repository at Yucca Mountain a reality.


International scientific consensus supports geologic disposal as the safest and most reliable method of spent nuclear fuel and high-level radioactive waste disposal currently available. The National Academy of Sciences has concluded that "after four decades of study, geological disposal remains the only scientifically and technically credible solution." The many studies, conducted not only by government agencies but also by the utility-funded Electric Power Research Institute, have shown that Yucca Mountain's remote location, climate and geology combine to make it an excellent choice for safe long-term storage. Extensive testing and modeling has shown that unique features of the area's geology add defense-in-depth to an equally well studied storage technology. DOE's thorough research shows that a repository at Yucca Mountain can protect public health and safety in accordance with established radiation protection standards. In addition, plans to maintain access to the repository for up to 300 years will ensure that advances in nuclear waste technology can be incorporated. The next step will be the rigorous Nuclear Regulatory Commission licensing process, which will independently evaluate the facility's design and operation.

The commercial nuclear power industry has more than 30 years of experience in the safe handling and transportation of nuclear fuel. We have developed safe and efficient methods for handling nuclear fuel along with loading and unloading fuel casks. The industry has already safely transported almost 3,000 domestic shipments of used nuclear fuel and more than 21,000 international shipments. This experience can help ensure the safe operation of the repository at Yucca Mountain. In addition, the NRC licensing and oversight processes will provide assurance that the repository is constructed and operated so as to always protect public safety and health.

With the completion of the Preliminary Site Suitability Evaluation, there is no scientific reason for DOE to delay the development of a federal repository. It is now time for the Secretary of Energy to recommend Yucca Mountain as the repository site, so that this much-needed project can move to the next step of the process, review by the NRC.

Thank you for your consideration.

Sincerely,

  
W. G. Hairston III

2

cc: H. Allen Franklin  
President and CEO  
Southern Company

David M. Ratcliffe  
President and CEO  
Georgia Power Company

Elmer B. Harris  
Chairman and CEO  
Alabama Power Company

Charles D. McCrary  
President and COO  
Alabama Power Company